UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1

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In re: Case No.: <u>24-16991-ABA</u>

BRAD ALAN HARLEY, Judge: Andrew B. Altenburg, Jr.

Debtor. Chapter: 13

## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the undersigned appears in the above-captioned Chapter 13 case as counsel to Franklin Mint Federal Credit Union and, pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure, hereby requests that all notices given or required to be given and all papers served or required to be served in this Chapter 13 case be delivered and served upon such parties at the address of their counsel as set forth below:

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PLEASE TAKE FURTHER NOTICE that the foregoing demand includes all notices and pleadings referred to in the above-mentioned Federal Rules of Bankruptcy Procedure, together with all orders and notices of applications, motions, petitions, pleadings, complaints or other documents which in any way affect the debtor or his property.

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The foregoing demand includes not only the notices and papers referred to in the

Bankruptcy Rules specified above, but also includes, without limitation, any notice, application,

complaint, demand, motion, petition, pleading or request, whether formal or informal, written or

oral, and whether transmitted or conveyed by mail, delivery, telephone, telecopy, telegraph, telex

or otherwise filed or made with regard to the above-referenced case and all proceedings therein.

Nothing contained herein shall be deemed or construed to be a waiver of any of the rights

of the Client, including, without limitation, to (i) have final orders in non-core matters entered only

after de novo review by a higher court, (ii) trial by jury in any proceeding so triable in this case, or

any case, controversy, or adversary proceeding related to this case, (iii) have the reference

withdrawn in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights,

claims, actions, defenses, setoffs, or recoupments to which the Client may be entitled in law or in

equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly

reserved.

KLEHR HARRISON HARVEY **BRANZBURG LLP** 

By: /s/Corinne Samler Brennan

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Date: July 17, 2024